

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

YURY MOSHA, RUSSIAN AMERICA INC.,

Plaintiffs,

v.

FACEBOOK, INC., INTERNET CORPORATION
FOR ASSIGNED NAMES AND NUMBERS
(ICANN), DYNADOT LLC, NAME.COM INC.,
NAME.COM LLC, NAMECHEAP, INC.,
NAMESILO, LLC, GRANSY S.R.O., HOSTING
UKRAINE LLC, GODADDY.COM, INC., PDR
LTD. d/b/a PUBLICDOMAINREGISTRY.COM,
REG.RU LLC, SIM-NETWORKS CIS, HETZNER
ONLINE GMBH, CLOUDFLARE, INC., VARITI
INTERNATIONAL GMBH, HOSTING
TECHNOLOGY LTD.,

Defendants.

CASE NO. 1:20-cv-02608

Civil Action

**DEFENDANT GODADDY INC.'S MOTION FOR EXTENSION OF TIME
TO RESPOND TO COMPLAINT**

1. Defendant GoDaddy Inc. ("GoDaddy"), through undersigned counsel, respectfully requests an extension of time until April 30, 2020 to respond to Plaintiffs Yury Mosha and Russian America Inc.'s Complaint.

2. Although Local Rules 5.2(b) and 7.1(d) permit such motions to proceed by letter if permitted by an individual judge's practices, in the absence of an assignment to a specific judge, GoDaddy proceeds by motion.

3. On March 27, 2020, GoDaddy filed a Notice of Removal to remove Plaintiff's Complaint from the Supreme Court of the State of New York, New York County to this Court.

4. Pursuant to Federal Rule of Civil Procedure 81(c)(2), a defendant who did not answer prior to removal must answer or present other defenses or objections within the longest of the follow periods:

(A) 21 days after receiving--through service or otherwise--a copy of the initial pleading stating the claim for relief;

(B) 21 days after being served with the summons for an initial pleading on file at the time of service; or

(C) 7 days after the notice of removal is filed.

5. Of the three periods set forth in Rule 81(c)(2), the longest period in these circumstances is set forth in Rule 81(c)(2)(A), and would require GoDaddy to respond to the Complaint by April 8, 2020.

6. GoDaddy respectfully requests a three week extension of time until April 30, 2020 to respond to the Complaint.

7. Federal Rule of Civil Procedure 6(b)(1) permits this Court to extend the time for GoDaddy to respond "for good cause."

8. GoDaddy submits that good cause exists for this modest extension of time requested because of the prevailing public health measures undertaken in this

jurisdiction, and the jurisdictions of counsel to be admitted *pro hac vice*, to combat COVID-19. These measures have required counsel and their support staff to work remotely. Moreover, counsel has only been recently retained to handle this particular matter.

9. This request is not made for improper purposes or for the sole purpose of causing delay.

WHEREFORE, GoDaddy respectfully requests that this Court grant its motion for an extension of time and permit GoDaddy to respond to the Complaint on or before April 30, 2020.

COZEN O'CONNOR

Dated: March 27, 2020

By: s/William Lesser

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*Attorneys for Defendant
GODADDY INC.*

CERTIFICATE OF SERVICE

I, William Lesser, hereby certify that on March 27, 2020, I caused a true and correct copy of the foregoing Motion for Extension of Time to Respond to Complaint and accompanying Proposed Order to be served upon the following via first-class mail:

Yury Mosha
85 Broad Street
New York, NY 10004
(646) 477-0500
yurymosha@gmail.com

Pro Se Plaintiff

COZEN O'CONNOR

Dated: March 27, 2020

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